

EXHIBIT Y

From: [Jaclyn Wanemaker](#)
To: [Maria T. Mastriano](#); [Steve Schwarz](#); [Christopher Betke](#)
Cc: [Teagan C. Dolan](#); [Shirley M. Marsh](#)
Subject: RE: [External] Marcellin and Hollowell v. Staples
Date: Thursday, June 8, 2023 10:45:33 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image010.png](#)

[EXTERNAL: This email originated from outside of the organization.]

I will circulate the draft today, thank you.

Jaclyn Wanemaker
 Partner
jwanemaker@smithsovik.com

	 Smith Sovik Kendrick & Sugnet, P.C. 6245 Sheridan Drive, Suite 218 Williamsville, NY 14221 P. 800-675-0011 F. 315-474-6015 www.smithsovik.com
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From: Maria T. Mastriano <mmastriano@pmtlawfirm.com>
Sent: Thursday, June 8, 2023 10:39 AM
To: 'Steve Schwarz' <sschwarz@faraci.com>; Christopher Betke <cbetke@coughlinbetke.com>
Cc: Teagan C. Dolan <tdolan@faraci.com>; Jaclyn Wanemaker <jwanemaker@smithsovik.com>; Shirley M. Marsh <smarsh@pmtlawfirm.com>
Subject: RE: [External] Marcellin and Hollowell v. Staples

Hi All – I do not, but I'll try my best to have it by next week.

Thanks.
 Maria

From: Steve Schwarz <sschwarz@faraci.com>
Sent: Thursday, June 8, 2023 10:37 AM
To: Christopher Betke <cbetke@coughlinbetke.com>
Cc: Maria T. Mastriano <mmastriano@pmtlawfirm.com>; Teagan C. Dolan <tdolan@faraci.com>; Jaclyn Wanemaker <jwanemaker@smithsovik.com>; Shirley M. Marsh <smarsh@pmtlawfirm.com>
Subject: RE: [External] Marcellin and Hollowell v. Staples

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If that is the case, then I apologize. Doesn't have to be today, but let's try to do it by next week. Maria, have you gotten dates for Staples 30b6 so we can add that to proposed stipulated Order?

Stephen G. Schwarz, Esq.
Managing Partner

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From: Christopher Betke <cbetke@coughlinbetke.com>
Sent: Thursday, June 8, 2023 10:35 AM
To: Steve Schwarz <sschwarz@faraci.com>
Cc: Maria T. Mastriano <mmastriano@pmtlawfirm.com>; Teagan C. Dolan <tdolan@faraci.com>; Jaclyn Wanemaker <jwanemaker@smithsovik.com>; Shirley M. Marsh <smarsh@pmtlawfirm.com>
Subject: RE: [External] Marcellin and Hollowell v. Staples

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Steve: I have the discovery deadline as June 30 so I do not believe that has passed. In any event, I have passed the baton to Jackie because I am simply swamped. She is going to draft the requested extension and circulate it. @ Jackie, do you think you will be able to circulate something today? Let me know. Thanks. Chris

CHRISTOPHER G. BETKE

PARTNER

DIRECT DIAL: (617)988-8047

cbetke@coughlinbetke.com

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From: Steve Schwarz <sschwarz@faraci.com>
Sent: Monday, June 5, 2023 5:40 PM
To: Christopher Betke <cbetke@coughlinbetke.com>
Cc: Maria T. Mastriano <mmastriano@pmtlawfirm.com>; Teagan C. Dolan <tdolan@faraci.com>; Jaclyn Wanemaker <jwanemaker@smithsovik.com>; Shirley M. Marsh <smarsh@pmtlawfirm.com>
Subject: RE: [External] Marcellin and Hollowell v. Staples

Chris

Please let me know when you plan on preparing the motion to the Court to extend discovery. We have now passed the current deadline.

Steve

Stephen G. Schwarz, Esq.
Managing Partner

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From: Steve Schwarz

Sent: Tuesday, May 30, 2023 6:35 PM

To: Christopher Betke <cbetke@coughlinbetke.com>

Cc: Maria T. Mastriano <mmastriano@pmtlawfirm.com>; Teagan C. Dolan <tdolan@faraci.com>; Jaclyn Wanemaker <jwanemaker@smithsovik.com>; Shirley M. Marsh <smarsh@pmtlawfirm.com>

Subject: Re: [External] Marcellin and Hollowell v. Staples

Thanks Chris

Sent from my iPhone

On May 30, 2023, at 6:12 PM, Christopher Betke <cbetke@coughlinbetke.com> wrote:

[EXTERNAL: This email originated from outside of the organization.]

We will circulate something tomorrow. Chris

CHRISTOPHER G. BETKE

PARTNER

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cbetke@coughlinbetke.com

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From: Steve Schwarz <sschwarz@faraci.com>

Sent: Tuesday, May 30, 2023 6:04 PM

To: Maria T. Mastriano <mmastriano@pmtlawfirm.com>; Christopher Betke <cbetke@coughlinbetke.com>

Cc: Teagan C. Dolan <tdolan@faraci.com>; 'Jaclyn Wanemaker' <jwanemaker@smithsovik.com>; Shirley M. Marsh <smarsh@pmtlawfirm.com>

Subject: RE: [External] Marcellin and Hollowell v. Staples

Maria

Do you have any dates? If not, I think we have to move forward with asking the Judge for an amended order ASAP.

Steve

<image009.png>

Stephen G. Schwarz, Esq.

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From: Maria T. Mastriano <mmastriano@pmtlawfirm.com>
Sent: Wednesday, May 24, 2023 11:12 AM
To: Steve Schwarz <sschwarz@faraci.com>; Christopher Betke <cbetke@coughlinbetke.com>
Cc: Teagan C. Dolan <tdolan@faraci.com>; 'Jaclyn Wanemaker' <jwanemaker@smithsovik.com>; Shirley M. Marsh <smarsh@pmtlawfirm.com>
Subject: RE: [External] Marcellin and Hollowell v. Staples

[EXTERNAL: This email originated from outside of the organization.]

I'll check into it and get back to you ASAP.

Thanks.
Maria

From: Steve Schwarz <sschwarz@faraci.com>
Sent: Wednesday, May 24, 2023 10:31 AM
To: Christopher Betke <cbetke@coughlinbetke.com>; Maria T. Mastriano <mmastriano@pmtlawfirm.com>
Cc: Teagan C. Dolan <tdolan@faraci.com>; 'Jaclyn Wanemaker' <jwanemaker@smithsovik.com>; Shirley M. Marsh <smarsh@pmtlawfirm.com>
Subject: RE: [External] Marcellin and Hollowell v. Staples

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Can you produce the 30b6 witness that first week of August as well Maria?

<image009.png>

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From: Christopher Betke <cbetke@coughlinbetke.com>
Sent: Wednesday, May 24, 2023 10:28 AM
To: Maria T. Mastriano <mmastriano@pmtlawfirm.com>; Steve Schwarz <sschwarz@faraci.com>
Cc: Teagan C. Dolan <tdolan@faraci.com>; 'Jaclyn Wanemaker' <jwanemaker@smithsovik.com>; Shirley M. Marsh <smarsh@pmtlawfirm.com>
Subject: RE: [External] Marcellin and Hollowell v. Staples

[EXTERNAL: This email originated from outside of the organization.]

Do we need a date for Staples too?

CHRISTOPHER G. BETKE

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From: Maria T. Mastriano <mmastriano@pmtlawfirm.com>

Sent: Wednesday, May 24, 2023 10:23 AM

To: 'Steve Schwarz' <sschwarz@faraci.com>; Christopher Betke <cbetke@coughlinbetke.com>

Cc: Teagan C. Dolan <tdolan@faraci.com>; 'Jaclyn Wanemaker' <jwanemaker@smithsovik.com>; Shirley M. Marsh <smarsh@pmtlawfirm.com>

Subject: RE: [External] Marcellin and Hollowell v. Staples

Good Morning,

I am available as follows:

1. Plaintiff – July 6th and 7th
2. HP – August 2nd and 3rd

Thanks.

Maria

From: Steve Schwarz <sschwarz@faraci.com>

Sent: Wednesday, May 24, 2023 10:16 AM

To: Christopher Betke <cbetke@coughlinbetke.com>; Maria T. Mastriano <mmastriano@pmtlawfirm.com>

Cc: Teagan C. Dolan <tdolan@faraci.com>; 'Jaclyn Wanemaker' <jwanemaker@smithsovik.com>

Subject: RE: [External] Marcellin and Hollowell v. Staples

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All three of those dates are currently clear for me. Pick whichever one works for you.

<image020.png>

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From: Christopher Betke <cbetke@coughlinbetke.com>
Sent: Wednesday, May 24, 2023 10:06 AM
To: Steve Schwarz <sschwarz@faraci.com>; 'Maria T. Mastriano' <mmastriano@pmtlawfirm.com>
Cc: Teagan C. Dolan <tdolan@faraci.com>; 'Jaclyn Wanemaker' <jwanemaker@smithsovik.com>
Subject: RE: [External] Marcellin and Hollowell v. Staples

[EXTERNAL: This email originated from outside of the organization.]

We would propose August 2, 3 or 4 at 7 am ET/7 pm Taiwan time for the HP deposition via zoom. Please let me know which date works. Thanks. Chris

CHRISTOPHER G. BETKE

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cbetke@coughlinbetke.com

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From: Steve Schwarz <sschwarz@faraci.com>
Sent: Wednesday, May 24, 2023 9:59 AM
To: 'Maria T. Mastriano' <mmastriano@pmtlawfirm.com>
Cc: Teagan C. Dolan <tdolan@faraci.com>; Christopher Betke <cbetke@coughlinbetke.com>; 'Jaclyn Wanemaker' <jwanemaker@smithsovik.com>
Subject: RE: Marcellin and Hollowell v. Staples

Maria

If you don't get back to me by the end of the day tomorrow with availability for rescheduling the Plaintiffs' depositions in July, we are going to set dates. Chris has been waiting on dates before submitting the consent motion to extend the Scheduling Order and the current Order expires next week. Please respond by the end of the day tomorrow. If the dates we choose turn out not to be good for you, we are not going to agree to adjourn them again.

Thank you.

Steve

<image021.png>

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From: Steve Schwarz
Sent: Friday, May 19, 2023 6:00 AM

To: Maria T. Mastriano <mmastriano@pmtlawfirm.com>
Cc: Teagan C. Dolan <TDolan@faraci.com>
Subject: RE: Marcellin and Hollowell v. Staples

Maria

Please get back to me with your availability in July so I can get dates set for Plaintiffs' depositions.

Steve

<image021.png>

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Managing Partner

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From: Steve Schwarz
Sent: Monday, May 15, 2023 4:49 PM
To: Maria T. Mastriano <mmastriano@pmtlawfirm.com>
Cc: Teagan C. Dolan <TDolan@faraci.com>
Subject: Marcellin and Hollowell v. Staples

Maria

Here are the word versions of the outstanding discovery demands to your clien. We also sent a deficiency letter on the first demands without a response. If you can't locate that, let me know and I can send it again.

I want to be able to tell my clients a date for their depositions so please check your schedule for July and let me know what dates are in or out.

Thanks

Steve

<image022.png>

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